1

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

2

THE HONORABLE Timothy W. Dore **CHAPTER 13** 

HEARING DATE: September 18, 2019 HEARING TIME: 9:30 a.m.

LOCATION: Seattle, WA

RESPONSE DUE: September 11, 2019

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON

In re:	Case No. 19-11983 TWD Ch. 13
Cori Lee M. Perry )	NOTICE OF HEARING AND MOTION TO AMEND/MODIFY CHAPTER 13 PLAN
Debtor(s)	

TO: Clerk of the United States Bankruptcy Court; and All parties in interest:

PLEASE TAKE NOTICE that a Motion to Amend Chapter 13 Plan IS SET FOR HEARING as follows:

DATE OF HEARING	September 18, 2019
TIME	9:30 am
JUDGE	Hon. Timothy W. Dore
LOCATION	US Courthouse Courtroom 8106 700 Stewart St. 8th Floor Seattle, Washington 98101
RESPONSE DUE	September 11, 2019

IF YOU OPPOSE the motion you must file your written response with the court clerk, and deliver copies to the undersigned and all interested parties NOT LATER THAN THE RESPONSE DATE.

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING WITHOUT FURTHER NOTICE, and strike the hearing.

## **MOTION**

**COMES NOW** the Debtor, by and through their attorney of record, and moves the Court for an order modifying Debtor's Chapter 13 Plan.

23

24

25

Case Information: No plan has been confirmed 1 Reason For Amendment: 2 1. Removes Soos Creek claim from Section IV. C.1.; 3 2. Reduces monthly payment on Ocwen mortgage arrears claim to \$0 in Section IV.C.1; 3. Increases monthly cure payment to Candlewood HOA to \$100 per month in Section 4 IV.C.1; 4. Adds secured claim of IRS to Section IV.C.b; 5 How Creditors Will Be Affected: Plan proposes payment of to \$0 to allowed, unsecured 6 non-priority claims. 7 WHEREFORE, Debtor moves this Court for an Order Amending Debtor's Chapter 13 8 Plan. 9 10 **DATED:** August 16, 2019 11 Respectfully submitted: 12 /s/ Mark A. Ditton #45432 Mark A. Ditton, WSBA#45432 13 Attorney for Debtor(s) 14900 Interurban Ave. S. #265 14 Seattle, WA 98168 206-674-4602 15 mark@nwrelief.com 16 **CERTIFICATE OF SERVICE** 17 18 The undersigned certifies that a copy of the foregoing Motion to Amend/Modify Chapter 13 Plan was served upon all Creditors and interested parties per the attached mailing matrix and 19 any parties requesting special notice by sending a true, full and exact copy enclosed in a sealed envelope by regular postage, prepaid, U.S. Mail, or, where specified, electronically: 20 Served electronically: 21 Office of the U.S. Trustee; 22 Jason Wilson-Aguilar; case trustee 23 Lesley D Bohleber on behalf of Interested Party Courtesy NEF ecfwawb@aldridgepite.com, llueke@ecf.inforuptcy.com 24 25

1	Brian J Hanis on behalf of Attorney Candlewood Ridge HOA
	bhanis@hiplawfirm.com
2	Dated this 16th Day of August, 2019.
3 4	/s/Mark Ditton Mark Ditton WSB#45432
5	14900 Interurban Ave. S. #265 Seattle, WA 98168
6	206-674-4602 (office) 866-241-4176 (fax)
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

Label Matrix for local noticing 0981-2 Case 19-11983-TWD Western District of Washington Seattle Fri Aug 16 13:55:32 PDT 2019 Bristol West Insurance PO Rox 31029

(p)BANK OF AMERICA PO BOX 982238 EL PASO TX 79998-2238 Lesley D Bohleber Aldridge Pite LLP 4375 Jutland Dr San Diego, CA 92117-3600

Independence, OH 44131-0029

CC Holdings 445 N. Pennsylvania St. Ste. 5 Indianapolis, IN 46204-1893 CW Nexus Credit Card Holdings 1, LLC Resurgent Capital Services PO Box 10368 Greenville, SC 29603-0368

Candlewood Ridge HOA Hanis Irvine Prothero, PLLC c/o Brian Hanis 6703 South 234th St., Suite 300 Kent, WA 98032-2903 Candlewood Ridge HOA PO Box 58397 Renton, WA 98058-1397 Capital One, N.A. c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701

Cedar River Water & Sewer District 18421 SE Petrovitsky Road Renton, WA 98058-0552 Citibank
Attn: Recovery/Centralized Bankruptcy
Po Box 790034
St Louis, MO 63179-0034

Comcast
Bankruptcy Notices
PO Box 34744
Seattle, WA 98124-1744

Continental Finance Co Po Box 8099 Newark, DE 19714-8099 Credit One Bank Attn: Bankruptcy Department Po Box 98873 Las Vegas, NV 89193-8873 Mark Ditton Northwest Debt Relief Law Firm 14900 Interurban Ave. S. Suite 265 Seattle, WA 98168-4618

FST Premier 3820 N. Louise Ave Sioux Falls, SD 57107-0145 Fingerhut Attn: Bankruptcy Po Box 1250 Saint Cloud, MN 56395-1250 First Premier Bank Attn: Bankruptcy Po Box 5524 Sioux Falls, SD 57117-5524

Genesis Bc/Celtic Bank Attn: Bankruptcy Po Box 4477 Beaverton, OR 97076-4401 Brian J Hanis Hanis Irvine Prothero PLLC 6703 South 234th St Ste 300 Kent, WA 98032-2903 IRS
Central Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

Intergrity Law Group 2033 6th Ave. Ste. 920 Seattle, WA 98121-2526 (p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999 Jefferson Capital Systems, LLC Po Box 1999 Saint Cloud, MN 56302

Kernique PO Box 1366 Hoboken, NJ 07030-1366 Kohls/Capital One Attn: Bankruptcy Po Box 30285 Salt Lake City, UT 84130-0285 LVNV Funding PO Box 10497 Greenville, SC 29603-0497

LVNV Funding c/o Resurgent Capital Services PO Box 112699 Greenville, SC 29603 LVNV Funding, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587 MABTC/Tidewater Credit Services Attn: Bankruptcy Po Box 13306 Chesapeake, VA 23325-0306 MATB/TFC PO Box 11743 Wilmington, DE 19850-1743 Merrick Bank/CardWorks Attn: Bankruptcy Po Box 9201 Old Bethpage, NY 11804-9001 MidAmerica Bank & Trust Company Attn: Bankruptcy 216 West Second St Dixon, MO 65459-8048

Midland Funding LLC PO Box 2011 Warren MI 48090-2011 Ocwen Loan Servicing LLC 12650 Ingenuity Dr. Orlando, FL 32826-2703 Cori Lee M Perry 17918 158th Pl. SE Renton, WA 98058-9125

(p)PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067 Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud Mn 56302-7999

Puget Sound Energy PO Box 91269 Bellevue, WA 98009-9269

Puget Sound Energy Vendor Collections Department -BOT-02G PO Box 97034 Bellevue, WA 98009-9734 Resurgent Capital Services as agent for Via Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587 Soos Creek Water & Sewer Distr 14616 SE 192nd St. Renton, WA 98058-9420

State Farm Insurance PO Box 5000 Dupont, WA 98327-5000 Synchrony Bank/Amazon PO Box 960013 Orlando, FL 32896-0013 Synchrony Bank/Care Credit Attn: Bankruptcy Dept Po Box 965060 Orlando, FL 32896-5060

(p)TIDEWATER FINANCE COMPANY P O BOX 13306 CHESAPEAKE VA 23325-0306 U.S. Bank National Association c/o PHH Mortgage Corporation 1 Mortgage Way, Mail Stop SV-22 Mt. Laurel, NJ 08054-4637 U.S. Department of Education Ecmc/Bankruptcy Po Box 16408 Saint Paul, MN 55116-0408

US Dept of Education Attn: Bankruptcy Po Box 16448 Saint Paul, MN 55116-0448 USAA Federal Savings Bank 10750 McDermott Fwy San Antonio, TX 78288-1600 United States Trustee 700 Stewart St Ste 5103 Seattle, WA 98101-4438

Waste Managment 2625 W. Grandview Rd. Phoenix, AZ 85023-3109 Webbank/Gettington Attn: Bankruptcy 6250 Ridgewood Rd Saint Cloud, MN 56303-0820 Western Progressive 3600 15th Avenue West, Ste. 20 Office C Seattle, WA 98119-1330

Jason Wilson-Aguilar 600 University St #1300 Seattle, WA 98101-4102 Bank of America PO Box 982238 El Paso, TX 79998 (d)Continental Finance Company Attn: Bankruptcy Po Box 8099

Newark, DE 19714

Jefferson Capital Systems LLC Po Box 7999

Saint Cloud Mn 56302-9617

Portfolio Recovery Attn: Bankruptcy 120 Corporate Blvd Norfold, VA 23502 (d)Portfolio Recovery Associates, LLC

POB 41067 Norfolk VA 23541 Tidewater Finance Company P.O. Box 13306 Chesapeake, VA 23325

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Courtesy NEF

(d) Jason Wilson-Aguilar 600 University St #1300 Seattle, WA 98101-4102 End of Label Matrix
Mailable recipients 54
Bypassed recipients 2
Total 56